UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD DIVISION OF JUDGES

	DIVISION OF JUDGES
MERCY HEALTH PARTNERS	
Employer	

MICHIGAN NURSES ASSOCIATION

Case 07-CA-232247

Petitioner

and

and

SEIU HEALTHCARE MICHIGAN

Intervenor	
	/

PETITIONER'S MOTION FOR EXTENSION OF TIME TO FILE BRIEF

Michigan Nurses Association, Petitioner, by its attorneys Nickelhoff & Widick, moves for an extension of time to file a post-hearing brief and states as follows:

- 1. At the conclusion of the hearing on September 15, 2020 Administrative Law Judge Sharon Steckler set a September 22, 2020 due date for post-hearing briefs.
- 2. The reporter has indicated that expedited transcript for the hearing will not be available until September 18, 2020.
- 3. The undersigned has four deadline responses due to the NLRB in the next week, some of which have been delayed because of the preparation and attendance at the instant hearing.
 - 4. The undersigned has four medical appointments during the week following the closing

of the hearing, three of which have been substantially delayed by COVID-19 closings, and the fourth which involves a regular treatment for a chronic disease that is incapacitating for a day.

5. The Employer does not oppose this request, and has requested a slightly longer extension to which Petitioner does not object. Intervenor opposes this motion.

Accordingly, Petitioner requests an three day extension of time to file a post hearing brief to September 25, 2020.

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Amy Bachelder

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September 17, 2020

CERTIFICATE OF SERVICE

Amy Bachelder, being first duly sworn, deposes and says that on the 17th day of September, 2020 she served a copy of Petitioner's Motion for Extension of Time to File Brief on the following via email:

Amy J. Zdravecky: Richard G. Mack:

Kelly Temple:

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